

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**
 Counts 1-5: 18 U.S.C. § 2113(a) - Bank or Credit Union  
 Robbery  
 Count 6: 18 U.S.C. § 922(g)(1) - Felon in Possession of a  
 Firearm

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: See Attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

YOLANDA BROWN, a/k/a "Yo Yo"

DISTRICT COURT NUMBER

CR16

0441

SI

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

Federal Bureau of Investigation

☒ person is awaiting trial in another Federal or State Court,  
 give name of court

U.S. v. Brown, CR 15-442 TEH

☐ this person/proceeding is transferred from another district  
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of  
 charges previously dismissed  
 which were dismissed on motion  
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW  
DOCKET NO.
☐ this prosecution relates to a  
 pending case involving this same  
 defendant
MAGISTRATE  
CASE NO.
☐ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding this  
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form BRIAN J. STRETCH

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) SCOTT D. JOINER

**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior  
 summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes  
 been filed? ☐ No

 If "Yes"  
 give date  
 filed
DATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 \* Where defendant previously apprehended on complaint, no new summons or  
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments:

**PENALTY SHEET ATTACHMENT**

COUNT ONE	<u>18 U.S.C. § 2113(a) – Robbery of Wells Fargo (01/11/2016)</u> Maximum Prison Term of 20 years. Maximum Fine of \$250,000. Maximum Term of Supervised Release of 3 years. Mandatory Special Assessment of \$100
COUNT TWO	<u>18 U.S.C. § 2113(a) – Robbery of Patelco Credit Union (01/13/2016)</u> Maximum Prison Term of 20 years. Maximum Fine of \$250,000. Maximum Term of Supervised Release of 3 years. Mandatory Special Assessment of \$100
COUNT THREE	<u>18 U.S.C. § 2113(a) – Robbery of Patelco Credit Union (02/19/2016)</u> Maximum Prison Term of 20 years. Maximum Fine of \$250,000. Maximum Term of Supervised Release of 3 years. Mandatory Special Assessment of \$100
COUNT FOUR	<u>18 U.S.C. § 2113(a) – Robbery of Citibank (06/09/2016)</u> Maximum Prison Term of 20 years. Maximum Fine of \$250,000. Maximum Term of Supervised Release of 3 years. Mandatory Special Assessment of \$100
COUNT FIVE	<u>18 U.S.C. § 2113(a) – Robbery of Wells Fargo (06/16/2016)</u> Maximum Prison Term of 20 years. Maximum Fine of \$250,000. Maximum Term of Supervised Release of 3 years. Mandatory Special Assessment of \$100
COUNT SIX	<u>18 U.S.C. § 922(g)(1) – Felon in Possession (07/29/2016)</u> Maximum Prison Term of Ten Years; Maximum Fine of \$250,000 Maximum Term of Supervised Release of Three Years; Mandatory Special Assessment of \$100

FILED  
2016 OCT 20 P 4:25  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NO. DIST. OF CA.

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

v.

CR16

0441

SI

YOLANDA BROWN

a/k/a "Yo Yo"

DEFENDANT(S).

## INDICTMENT

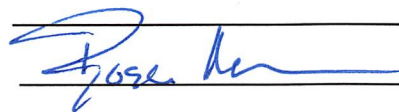
VIOLATIONS: 18 U.S.C. § 2113(a) – Bank and Credit Union  
Robbery (Counts One through Five); 18 U.S.C. § 922(g)(1) – Felon in Possession  
of a Firearm (Count Six); 18 U.S.C. § 924(d)(1) – Forfeiture of Firearm and Ammunition

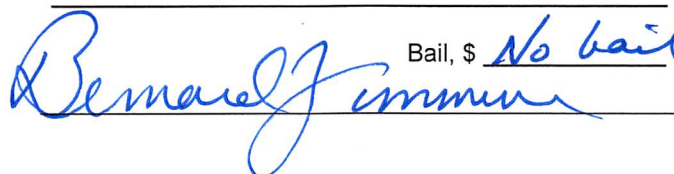
A true bill.



Foreman

Filed in open court this 20 day of OCT, 2016

 ROSE MATHER  
Clerk

 Bail, \$ No bail warrant

FILED  
2016 OCT 20 P 4: 25  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NO. DIST. OF CA.

BRIAN J. STRETCH (CABN 163973)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SI

UNITED STATES OF AMERICA,

CR 16 0441

Plaintiff,

v.

YOLANDA BROWN,  
a/k/a "Yo Yo,"

Defendant.

VIOLATIONS: 18 U.S.C. § 2113(a) – Bank and  
Credit Union Robbery (Counts One through Five); 18  
U.S.C. § 922(g)(1) – Felon in Possession of a Firearm  
(Count Six); 18 U.S.C. § 924(d)(1) – Forfeiture of  
Firearm and Ammunition

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 2113(a) – Bank Robbery)

1. On or about January 11, 2016, in the Northern District of California, the defendant,

YOLANDA BROWN,  
a/k/a "Yo Yo,"

knowingly took by intimidation from the persons and presence of employees of Wells Fargo Bank,  
located at 2055 Chestnut Street, San Francisco, California, money belonging to and in the care, custody,  
control, management, and possession of Wells Fargo Bank, the deposits of which were then insured by  
the Federal Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section  
2113(a).

INDICTMENT

1 COUNT TWO: (18 U.S.C. § 2113(a) – Credit Union Robbery)

2 2. On or about January 13, 2016, in the Northern District of California, the defendant,

3 YOLANDA BROWN,  
4 a/k/a “Yo Yo,”

5 knowingly took by intimidation from the persons and presence of employees of Patelco Credit Union,  
6 located at 1358 Fairmont Drive, San Leandro, California, money belonging to and in the care, custody,  
7 control, management, and possession of Patelco Credit Union, the accounts of which were then insured  
8 by the National Credit Union Administration (NCUA), in violation of Title 18, United States Code,  
9 Section 2113(a).

10 COUNT THREE: (18 U.S.C. § 2113(a) – Credit Union Robbery)

11 3. On or about February 19, 2016, in the Northern District of California, the defendant,

12 YOLANDA BROWN,  
13 a/k/a “Yo Yo,”

14 knowingly took by intimidation from the persons and presence of employees of Patelco Credit Union,  
15 located at 1358 Fairmont Drive, San Leandro, California, money belonging to and in the care, custody,  
16 control, management, and possession of Patelco Credit Union, the accounts of which were then insured  
17 by the National Credit Union Administration (NCUA), in violation of Title 18, United States Code,  
18 Section 2113(a).

19 COUNT FOUR: (18 U.S.C. § 2113(a) – Bank Robbery)

20 4. On or about June 9, 2016, in the Northern District of California, the defendant,

21 YOLANDA BROWN,  
22 a/k/a “Yo Yo,”

23 knowingly took by intimidatio, from the persons and presence of employees of Citibank, located at 2400  
24 19th Avenue, San Francisco, California, money belonging to and in the care, custody, control,  
25 management, and possession of Citibank, the deposits of which were then insured by the Federal  
26 Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section 2113(a).

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1 COUNT FIVE: (18 U.S.C. § 2113(a) – Bank Robbery)

2 5. On or about June 16, 2016, in the Northern District of California, the defendant,

3 YOLANDA BROWN,  
4 a/k/a “Yo Yo,”

5 knowingly took by intimidation from the persons and presence of employees of Wells Fargo Bank,  
6 located at 3365 Deer Valley Road, Antioch, California, money belonging to and in the care, custody,  
7 control, management, and possession of Wells Fargo Bank, the deposits of which were then insured by  
8 the Federal Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section  
9 2113(a).

10 COUNT SIX: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm and Ammunition)

11 6. On or about July 27, 2016, in the Northern District of California, the defendant,

12 YOLANDA BROWN,  
13 a/k/a “Yo Yo,”

14 having been previously convicted of a crime punishable by a term of imprisonment exceeding one year,  
15 unlawfully and knowingly possessed a firearm, specifically: one Taurus PT 945, .45 caliber ACP semi-  
16 automatic pistol, with the serial number obliterated except for the number 7, in and affecting interstate  
17 and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

18 FORFEITURE ALLEGATIONS: (18 U.S.C. § 924(d)(1))

19 The allegations contained in Count Six of this Indictment are realleged and by this reference  
20 fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C.  
21 § 924(d)(1).

22 Upon a conviction for the offense alleged in Count Six above, defendant,

23 YOLANDA BROWN,  
24 a/k/a “Yo Yo,”

25 shall forfeit to the United States any firearm or ammunition involved in or used in any knowing  
26 violation of said offense, including but not limited to the following property: one Taurus PT 945, .45  
27 caliber ACP semi-automatic pistol, with the serial number obliterated except for the number 7; all in

28 //


1 violation of Title 18, United States Code, Section 924(d)(1).

2  
3 DATED: 10/20/16

A TRUE BILL.

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5   
6 FOREPERSON

7 BRIAN J. STRETCH  
8 United States Attorney

9   
10 STEPHEN J. MEYER  
11 Chief, Organized Crime Strike Force

12 (Approved as to form: )  
13 AUSA SCOTT D. JOINER

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INDICTMENT